



**ILUKA**



**Iluka Resources Ltd**

**WIM100 Test Pit**

**Community Engagement Plan**

**Exploration Licence No. 4282 (EL4282)**

*Mineral Resources (Sustainable Development) Act 1990*

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## Document control

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# 1 Introduction

## 1.1 Iluka Resources Limited

Iluka Resources Limited (Iluka) is an Australian Securities Exchange listed resources company. It is a major participant in the global mineral sands sector, involved in the sales and marketing of titanium based products (rutile, ilmenite, synthetic rutile) and zircon. The company's business model involves mineral sand exploration, project development, operations and marketing.

Conventional coarse-grained mineral sand deposits have been mined at the Douglas and Echo mine sites near Balmoral in south-west Victoria, and at the Kulwin and WRP mine sites near Ouyen in the north-west of the state. These sites are currently within the rehabilitation phase, although a small portion of the former Douglas Mine continues to receive the tailings waste stream from the Hamilton Mineral Separation Plant for disposal.

## 1.2 Background

Western Victoria hosts a number of fine-grained mineral sand deposits that as yet have not been developed due to technical difficulties of processing fine grained deposits. Iluka acquired the WIM50 and WIM100 in-ground resources (EL4282) as part of the Basin Minerals takeover. Optimised resource and reserve boundaries have been developed based on existing drilling results, however further work is required to determine whether a mining proposal will be developed for any of the deposits.

Iluka proposes to excavate a test pit in the WIM100 deposit within EL4282 to bulk sample at least 500 dry tonnes, and potentially up to 1,500 dry tonnes, of ore for further metallurgical test work. The test pit site is located within the municipality of Horsham Rural City.

The proposed test pit operations require an Exploration Work Plan (EWP) to be lodged using the DEDJTR Resource Rights Allocation and Management (RRAM) system. The Work Plan must be developed in accordance with the DEDJTR publication *Preparation and Approval of Work Plans & Work Plan Variations using RRAM: Guideline for Mineral Exploration Projects*, Version v0.5, July 2017 (the RRAM Guideline).

Section B3 of the RRAM Guideline outlines the requirement to develop a Community Engagement Plan (CEP) as a mandatory supporting document to the Exploration Work Plan for the WIM Test pit operations, and this document satisfies that requirement.

## 1.3 Purpose

This document fulfils Iluka's obligation to prepare a CEP, as defined in section 39A of the *Mineral Resources (Sustainable Development) Act 1990*, and Schedule 14 of the *Mineral Resources (Sustainable Development) (Minerals Industries) Regulations 2013*.

The CEP identifies the stakeholders relevant to the WIM100 Test Pit, and describes how, when and what engagement will occur with those communities and stakeholders during approvals, site establishment, operational and rehabilitation stages of the site.

## 1.4 Scope

This CEP applies to the operations undertaken at the WIM100 Test Pit work area as illustrated in Figure 2 below.

This CEP applies to all phases (site establishment, test pit bulk sampling operations, site rehabilitation) of the WIM100 test pit site as described in Section 5.2 of the WIM100 Test Pit (EL4282) – Exploration Work Plan (WIM100 Test Pit EWP).

This CEP is a subsidiary 'risk management plan' to the 2018 WIM100 Test Pit EWP and provides the framework for the consultation with stakeholders during the WIM100 test pit site establishment, operational and rehabilitation phases.

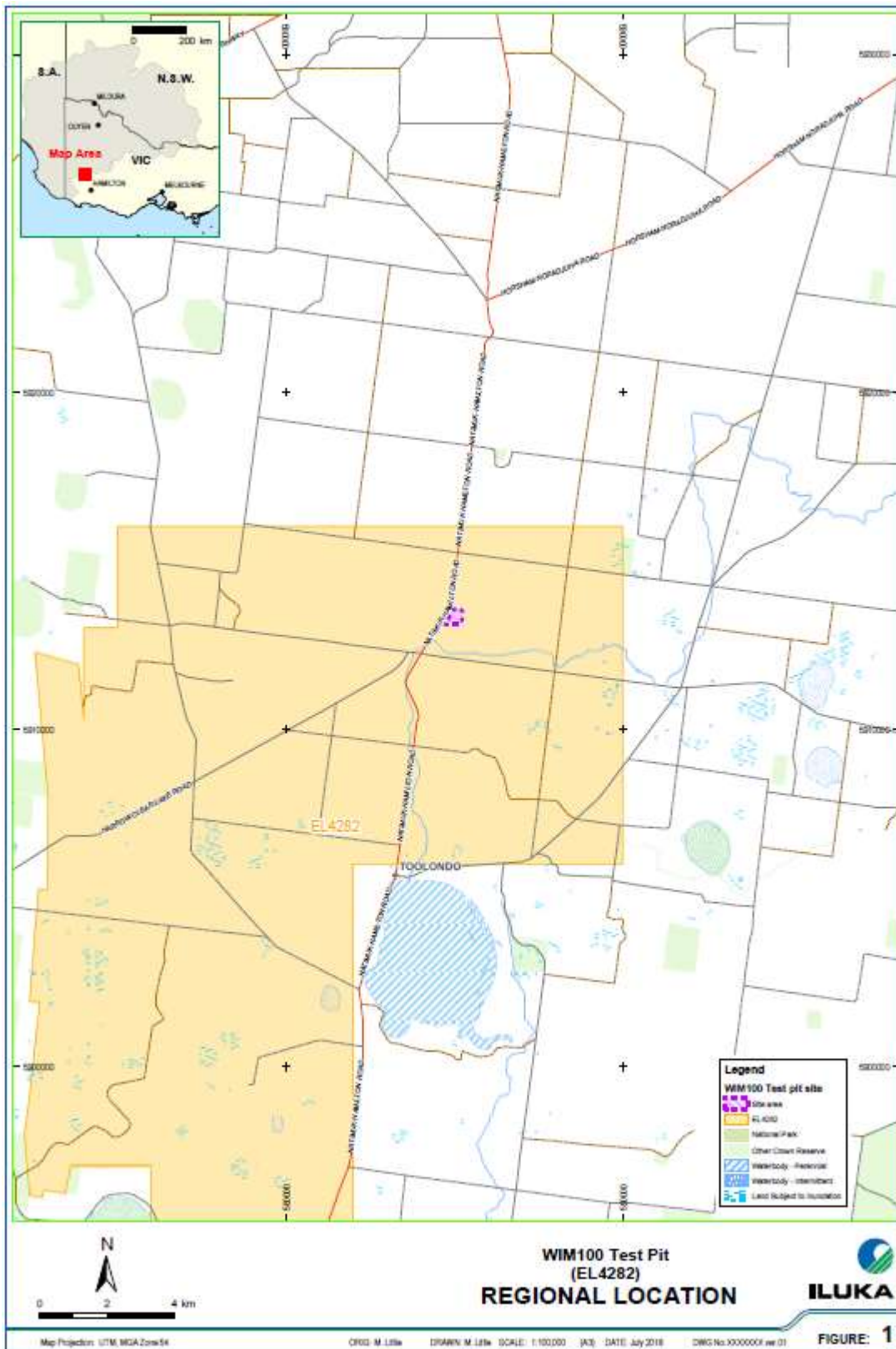


Figure 1: WIM100 test Pit - Location

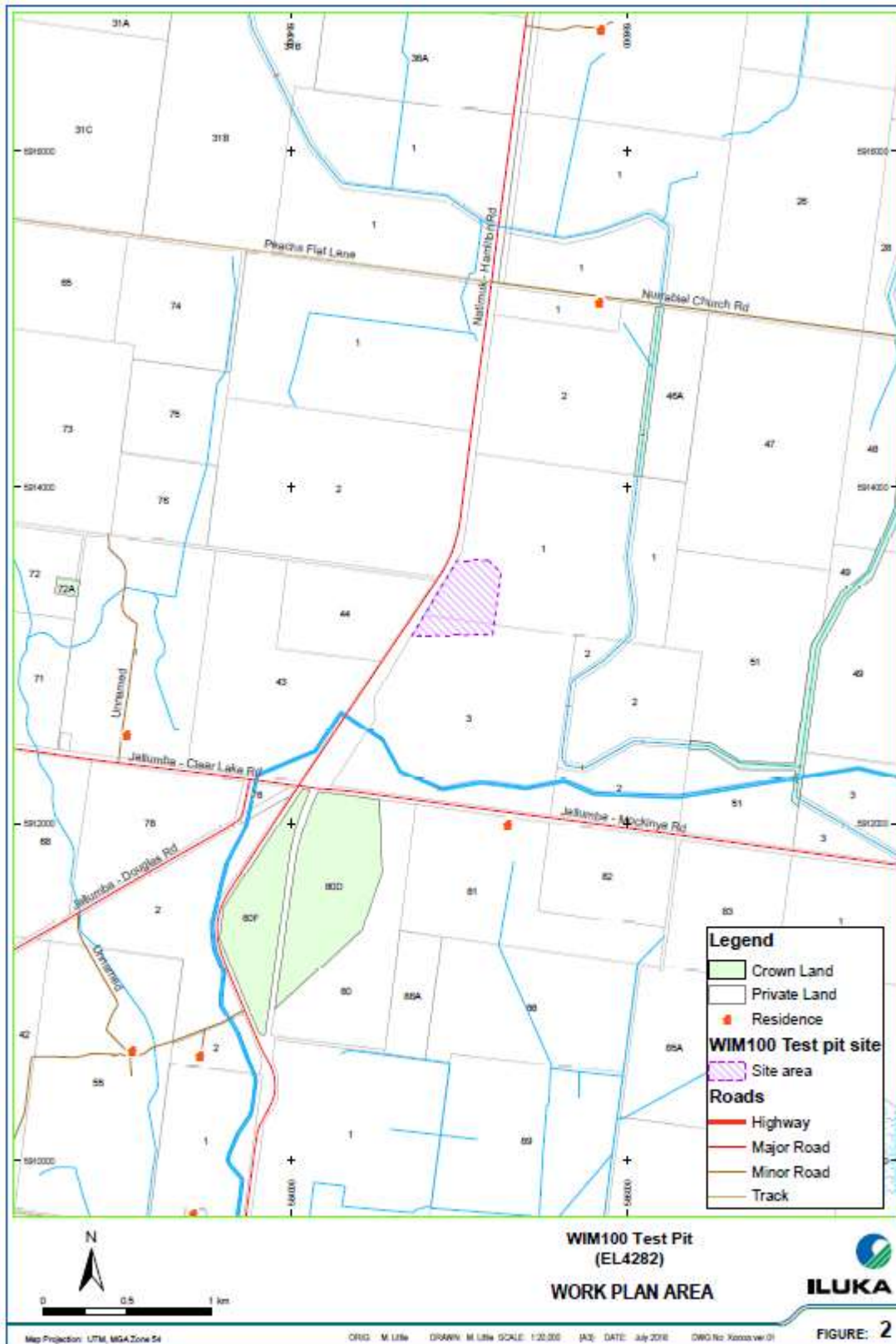


Figure 2: WIM100 Test Pit – work plan area

## 2 Regulatory context

### 2.1 Legislation

The *MRSA* and the Mineral Resources (Sustainable Development) (Mineral Industries) Regulations 2013 state that mining licensees have a duty to consult with the community across the life cycle of an operation, from exploration through to the operational phase and rehabilitation.

The specific requirements of the Act and Regulations applicable to this CEP are outlined in Table 1.

**Table 1: Regulatory requirements for Community Engagement Plans**

Condition	Obligation	Comment
<i>Mineral Resources (Sustainable Development) Act 1990</i>		
Sec 39A	<p><b>39A. Licensee's duty to consult with community</b>            A licensee has a duty to consult with the community throughout the period of the licence by:</p> <p>(a) sharing with the community information about any activities authorised by the licence that may affect the community; and</p> <p>(b) giving members of the community a reasonable opportunity to express their views about those activities.</p>	<p>Satisfied through the implementation of this CEP.</p> <p>Mechanisms for community engagement and management of community feedback are addressed in Section 4 of this plan.</p> <p>This CEP is a subsidiary plan to WIM100 Test Pit (EL4282) Exploration Work Plan.</p>
<i>Mineral Resources (Sustainable Development) (Mineral Industries) Regulations 2013</i>		
Schedule 14 Item 4	<p><b>For exploration licences</b></p> <p><b>4.</b> A description of the proposed arrangements for consultation with landholders, Crown land managers and local councils</p>	<p>Satisfied through the implementation of this CEP.</p> <p>Community identification addressed in Appendix A, and summarised in Section 3 of this plan.</p> <p>Mechanisms for community engagement addressed in Section 4 of this plan.</p> <p>Mechanisms for managing community feedback, concerns and complaints engagement also addressed in Section 4 of this plan.</p>

#### 2.1.1 Supporting guidelines

Detailed guidance on the preparation of CEPs is provided in the DEDJTR *Community Engagement Guidelines for Mining and Mineral Exploration in Victoria* (June 2017) ("the Guidelines").

The structure and content of this CEP complies with the requirements of the Guidelines.

## 3 Community Assessment

### 3.1 Community overview

The WIM100 test pit site is situated in the southern Wimmera region of Western Victoria and is located in the north-eastern corner of the much larger exploration lease EL4282. The test pit site is within the Horsham Rural City Local Government area, and the Wimmera River catchment.

Prior to European settlement the region was occupied by Wotjobaluk, Jaadwa, Jadawadjali, Wergaia and Jupagulk Traditional Owner groups. These groups are represented by the Barengi Gadjin Land Council Aboriginal Corporation (BGLCAC), the Registered Aboriginal Party (RAP) under the Victorian *Aboriginal Heritage Act 2006*.



The nearest minor townships to the test pit site are Balmoral (approximately 37km south) and Harrow (approximately 41km south-west). The nearest localities are Toolondo (approximately 8km south), Clear Lake (approximately 8km west), Noradjuha (approximately 9km north) and Nurrabel (approximately 7km east).

The nearest major towns are Horsham (approximately 30km north-east) and Hamilton (approximately 90km south). The Horsham Rural City shire has a population of approximately 19,800 persons, with three-quarters of the population being residential within the township of Horsham. Rural land is used largely for agriculture, particularly wheat, canola and grain growing and sheep grazing (ABS, 2016).

The surrounding land is predominantly zoned as 'Farming under the Horsham Planning Scheme. Dry land agriculture (cropping and grazing) is the predominant land use. The population in the vicinity of the site can be generally described as a low density agricultural community.

### 3.2 Previous stakeholder engagement activities

Engagement with many of the identified stakeholders has previously occurred during the approvals, operational and current rehabilitation phases of the nearby Douglas and Echo mines. Iluka's exploration drilling program has also included landholder interaction and land access consent for drilling activities in the local region in 2014, 2016 and 2018, including on the land upon which the test pit is located.

Initial stakeholder engagement regarding the intention to establish a test pit has occurred as detailed in Table 2 below.

**Table 2: Stakeholder engagement**

Stakeholder	Initial engagement
Landholder	February 2018
Earth Resources Regulation, DEDJTR	February 2018
Horsham Rural City Council	May 2018
Community*	May 2018
VicTrack	June 2018
VicRoads	July 2018
GWMWater	July 2018
Department of Health and Human Services	August 2018
Barengi Gadjin Land Council Aboriginal Corporation	August 2018

\*May 2018 edition of the Iluka Murray Basin Newsletter

An Environmental Review Committee (ERC) was established for the Douglas mine site in 2003, and has met quarterly since this time. The ERC includes representatives from Local Government Authorities, Statutory Authorities, local landowners, non-government organisations and community groups. Meetings of the ERC are also open to the public. The purpose of the ERC is to review environmental performance relating to the Douglas and Echo mines (DEDJTR, 2018). Iluka has also used ERC meetings as a forum for consulting with the local community on new mine approvals (such as the former Echo satellite mine development), and variations to the Douglas mine Work Plan approval. The intention to establish a test pit for bulk sampling activities was flagged during the May 2018 ERC meeting, and the updates will continue to be provided to the Douglas ERC as appropriate.

Other stakeholder engagement activities that have been conducted in the local region by Iluka in the past include, but are not limited to:

- Tours of the Douglas mine site
- Public information sessions

- Newsletters;
- Media releases;
- Targeted consultation with affected land owners (meetings, phone calls etc);
- Staffed displays at community events (Balmoral Show and Hamilton 'Sheepvention').

These prior engagement activities have served to identify many of the relevant stakeholders to the Iluka WIM100 Test Pit (refer Section 3.4 below)

### **3.3 Identification of affected communities**

Per the Guidelines, stakeholder identification has considered communities based on their categories of place, interest and standing (Table 3).

While the WIM100 Test Pit operations are completely separate from operations at Iluka's nearby Douglas and Echo mine sites, it is recognised that community and stakeholder interest in Iluka's operations can transcend site boundaries. Therefore, while this analysis has been undertaken for the test pit site, historical opinions, views and/or concerns toward Iluka's operations across the broader region are also pertinent to this CEP and Iluka's engagement.

For purposes of this CEP, the classification of community stakeholders in Table 3 is based on the following:

#### **Community of Place**

These stakeholders:

- own or manage<sup>1</sup> land that is subject to test pit operations; or
- are local to or neighbour the test pit site (indirect impact); or
- have a cultural connection to the land affected by the test pit.

The interests and questions of these stakeholders are considered as high priority/high importance in terms of consultation and engagement.

#### **Community of Standing**

These stakeholders:

- have a statutory interest in the site and/or specific activities therein (e.g. under legislation, approvals, licences and permits); or
- have authority over land and other resources that may be affected by site activities (e.g. local government, water authorities, catchment management authorities); or
- are recognised bodies with a special interest in the operation.

The impacts, interests and concerns of these stakeholders are always important given their role as regulators, managing authorities of public/environmental resources and representatives of the public and community.

#### **Community of Interest**

These stakeholders are:

- not impacted, or only infrequently impacted, by site activities; or
- may have a low level of interest in the test pit site / Iluka's activities.

Engagement with these stakeholders is typically undertaken in an ad-hoc manner, if/where matters arise.

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<sup>1</sup> Includes local government authorities (LGAs) who manage made and unmade road reserves

**Table 3: WIM100 Test Pit – stakeholder mapping (as at July 2018)**

Category	Identified Stakeholders
<b>Community of Place</b>	<ul style="list-style-type: none"> <li>• Landowners and land managers directly affected by the test pit</li> <li>• Neighbouring landowners/residents</li> </ul>
<b>Community of Standing</b>	<ul style="list-style-type: none"> <li>• State Regulatory agencies:               <ul style="list-style-type: none"> <li>○ DEDJTR (Earth Resources Regulation)</li> <li>○ EPA Victoria</li> <li>○ Department of Human &amp; Health Services (DHHS)</li> <li>○ Department of Environment, Land, Water and Planning (DELWP)</li> <li>○ VicRoads</li> <li>○ VicTrack</li> </ul> </li> <li>• Barengi Gadjin Land Council Aboriginal Corporation (BGLCAC), registered Aboriginal Party (RAP) representing Traditional Owner groups.</li> <li>• Local government and other agencies:               <ul style="list-style-type: none"> <li>○ Horsham Rural City Council (HRCC)</li> <li>○ Wimmera Catchment Management Authority</li> <li>○ Grampians Wimmera Mallee Water</li> </ul> </li> </ul>
<b>Community of Interest</b>	<ul style="list-style-type: none"> <li>• Public users of transport routes;</li> <li>• Iluka contractors and vendors</li> <li>• Local and regional townships: e.g. Horsham, Hamilton, Harrow and Balmoral businesses and residents;</li> <li>• Emergency services providers (particularly local CFA brigades, and Wimmera Base Hospital in Horsham).</li> <li>• Douglas Mine ERC</li> </ul>

### 3.4 Potential community impacts, concerns and interests

Planning and undertaking community engagement requires an understanding of the impacts, concerns and interests applicable to the communities and other stakeholders identified above. .

These may be actual, potential or perceived and are gleaned from various sources such as prior and current Iluka engagement activities, site experience, local knowledge/relationships, media, as outcomes of risk assessment processes (for example, assessing potential site impacts and affected parties within the EWP), stakeholder perception surveys and the activities or operations of other similar organisations.

The following sections consider the various potential impacts, concerns and interests for each community stakeholder identified in Table 3 for the test pit site, and are also applicable for the nearby Douglas and Echo mine sites. Iluka recognises that the views, concerns and interests of the community (whether actual or perceived) vary widely and are dynamic. Accordingly, the points listed are not presented as a conclusive or authoritative commentary on the community, but are intended to guide Iluka's engagement approach at the current date of this CEP.

#### 3.4.1 Landowners and land managers directly affected by the WIM100 Test Pit site

Potential impacts, concerns and interests with respect to landowners and land managers directly affected by the WIM100 Test Pit site include, or may include:

- Timeliness of rehabilitation and return to final landform;
- The quality of final rehabilitation and implications to achieving the agreed post-test pit land use. This includes the key focus of landform stability;
- Fulfilling commitments made under land access agreements;
- Impacts from site activities (dust, noise, light pollution, fire, runoff, groundwater contamination, transport routes and other);
- The visual amenity (aesthetic) of the rehabilitated final landform; and

- Access to rehabilitated land for cropping and grazing in accordance with agreements.

### **3.4.2 Neighbouring landowners/residents**

Potential impacts, concerns and interests with respect to neighbouring landowners and residents to the test pit site may include:

- Impacts from site activities (as above); and
- The visual amenity (aesthetics) of the rehabilitated final landform.

### **3.4.3 Aboriginal communities (Traditional Owner groups)**

The Barengi Gadjin Land Council Aboriginal Corporation (Barengi Gadjin) are the Registered Aboriginal Party (RAP) representing the Wotjobaluk, Jaadwa, Jadawadjali, Wergaia and Jupagulk Traditional Owner groups in the region.

Potential impacts, concerns and interests in relation to Traditional Owner (TO) groups may include:

- The management and protection of any cultural material discovered during the period of site operations, particularly during the site establishment phase; and
- The rehabilitation process and the quality of final rehabilitation (e.g. 'looking after country').

### **3.4.4 Communities along / users of transport routes**

Potential impacts, concerns and interests in relation to communities along and public users of transport routes (e.g. Natimuk-Hamilton Rd) may include:

- General community concern regarding an increase in site-related traffic during the site establishment, operational and rehabilitation phases of the test pit site; and
- General community concern regarding the condition and maintenance of rural roads in the vicinity of the test pit site and region more generally.

### **3.4.5 Regulatory authorities**

Potential impacts, concerns and interests in relation to the regulatory authorities include:

- Compliance with relevant regulation;
- Desire for consultative approach with Iluka, but strictly within the bounds of legislation;
- Expectation that Iluka achieve high-levels of environmental and rehabilitation performance; and
- Appropriate engagement with identified stakeholders.

### **3.4.6 Local government authorities**

Potential impacts, concerns and interests in relation to the local government include:

- Compliance with relevant regulation;
- Ensuring the post-exploration land use is compatible with the local government planning scheme;
- Desire to be kept informed by Iluka as to general business dealings in the region and activities at the test pit site; and
- Appropriate engagement with identified stakeholders.

### **3.4.7 Iluka contractors and vendors**

Potential impacts, concerns and interests in relation to Iluka contractors and vendors include:

- Increased or new business dealings with Iluka due to the site establishment, operational and rehabilitation phases of the test pit (financial opportunity).

### 3.4.8 Local and regional townships

Potential impacts and interests in relation to local and regional townships include:

- Increased or new employment opportunities due to the site establishment, operational and rehabilitation phases of the test pit;
- Increased or new indirect economic benefit from exploration operations (e.g. food, accommodation and other services) due to the site establishment, operational and rehabilitation phases of the test pit; and
- Level of concern regarding an increase in site-related traffic during site establishment, operational and rehabilitation phases of the test pit.

### 3.4.9 Emergency services

Potential impacts and interests in relation to emergency services providers include:

- Interest in the intensity and frequency of land management activities undertaken by Iluka (e.g. control of fuel load and fire risk); and
- Desire to maintain emergency access into the test pit site for fire response and control, including access to water resources for fire-fighting (e.g. site stormwater ponds, test pit for aerial appliances).

### 3.4.10 Local media

Potential impacts and interests in relation to local media include:

- Interest in the reporting on the progress of site establishment, operations and rehabilitation;
- Interest in reporting on community sentiment and/or relationship with Iluka and its regional activities;
- Interest in the potential for future developments by Iluka in the region; and
- Interest in investigation and reporting on local mining-related activities in response to broader trends in the mining industry and other mineral exploration and/or mining projects in Victoria.

## 3.5 Community attitudes and expectations

Iluka conducted a Social Impact Assessment (SIA) across all of its Australian operations in 2012. The assessment included the nearby Douglas mine site via direct face-to-face engagement with key stakeholders, and through telephone interviews with individuals selected at random within communities surrounding the site. With respect to the Douglas site, this SIA confirmed many of the key areas for improvement required by Iluka in the eyes of local communities that have been acknowledged in this CEP (low perceived benefits from the site, low trust/fairness, concern over Iluka's environmental credibility and low reputation).

Iluka has undertaken a stakeholder perception survey in Q3 2018 across all of its activities in Australia, including the region local to the Douglas site. This survey will provide a means of re-assessing (base-lining) community attitudes and expectations, with the outcomes used to refine the engagement strategies presented in this CEP.

Community attitudes and expectations may also be identified through:

- Meetings or phone calls with land owners;
- interactions at community events (such as 'Sheepvention' in Hamilton);
- stakeholder perception surveys, as may be commissioned by Iluka; or
- comments or complaints lodged by members of the community.

### 3.5.1 Managing differences

Iluka recognises that community expectations regarding our activities and how we engage will, at times, differ from what Iluka can or is able to provide.

Handling of grievances will be in accordance with the Iluka Group Procedure – Grievance Management (PRC3062) (Refer Appendix 1).

## 4 Engagement

### 4.1 Provision of information

Iluka will provide information to the community through the following means:

- Newsletters (periodic);
- Media releases (periodic);
- ASX releases (as required);
- Iluka Sustainability Report (annually);
- Iluka corporate website; and
- Informal meetings (e.g. face-to-face meetings with landowners).

### 4.2 Consultation schedule

A schedule for stakeholder consultation, based on specific matters of importance, is provided in Table 4. This table is not intended as an exhaustive schedule for consultation, and may be updated as required.

**Table 4: Proposed consultation schedule**

Milestone or event	Engagement themes	Target stakeholders	Suggested methods
Pre-submission of Exploration Work Plan	Proposed test pit operation Approval requirements	Affected landowner Community of standing stakeholders	Face-to-face meetings Phone calls or emails
Approval of Exploration Work Plan		DEDJTR Affected landowner	Phone calls or emails Face to face meetings
		Community of interest stakeholders	Media release Newsletter
Commencement of site establishment activities		Affected landowner Community of interest stakeholders	Media release Newsletter
Test pit operations	Upon discovery of cultural artefacts	Traditional Owners (via BGLCAC)	Formal correspondence Phone calls or emails Site meeting
Significant change to rehabilitation schedule	Land affected, nature of the change, and the rationale for change	Affected land owner	Face-to-face meeting Phone call
		DEDJTR	Meeting or phone call/email combination
Planning for reinstatement of any cultural heritage artefacts	Request collaboration on appropriate return of artefacts.	Traditional Owners (via BGLCAC)	Formal correspondence Site meeting
		Affected land owners/land managers	Formal correspondence Site meeting
Completion of rehabilitation operations	End of active operations on the site.	Affected land owner	Formal correspondence Face-to-face meeting
	Monitoring to ensure rehabilitation is successful		Site meeting

Milestone or event	Engagement themes	Target stakeholders	Suggested methods
	will be ongoing.	DEDJTR	Formal correspondence Meeting or phone call/email combination
		Local Government	Formal correspondence Meeting or phone call/email combination
		Community of interest stakeholders	Media release Newsletter
Rehabilitation deemed complete and successful	Monitoring data and other evidence demonstrate that rehabilitation objectives and obligations have been met.  (E.g. no further activities on site are expected. Confirmation of completion will be sought from regulatory agencies.	Affected land owner	Formal correspondence Meeting
		DEDJTR	Rehabilitation Completion Report
Ongoing	Any potential future developments subsequent to completion of test pit operations	Community of standing stakeholders Community of interest stakeholders	Face-to-face meetings Media release Newsletters Sustainability report

### 4.3 Community feedback

Iluka will receive feedback from the community through the following means:

- Iluka Community Contact phone number (1800 201 113);
- Feedback given directly to an Iluka employee; and
- Via the Iluka corporate website, communities support email service (email address to enable community members to provide feedback or to register a grievance ([communities.support@iluka.com](mailto:communities.support@iluka.com))).

### 4.4 Community concerns and complaints

Iluka will respond to community concerns and complaints received in the following manner (in accordance with the Iluka Group Procedure – Grievance Management, PRC3062):

- Collect details of the complainant and their issue via the 1800 line (1800 201 113), or other means;
- Acknowledge the grievance within 2 days (if possible), or directly if the grievance is lodged via phone;
- Advise the complainant that they may remain anonymous; declare any information as confidential; or opt-out of the grievance process at any time should they wish to do so. Where the complainant is in a vulnerable position or otherwise at risk of harm, the complainant should also be informed of any appropriate support services available;
- Document the initial grievance incident record using Iluka’s Loss Control Card system (Cintellate Incident Management System). Follow-up consultation shall be recorded in Consultation Manager;
- Where further information is required to verify or understand the nature of the grievance, it shall be investigated. Site-level mechanisms (e.g. commitments of licenses, approvals or other instruments) shall determine how a grievance is to be investigated, any timelines that apply and procedures for

reporting investigation outcomes. Investigations shall be undertaken in a timely manner (i.e. within 1–2 weeks) as specified in the local-level mechanism;

- Where a credible grievance is found or is suspected to exist, a plan to remedy the issue(s) shall be proposed, and where possible agreed on with the complainant. Where complainants or affected parties are numerous, efforts to engage appropriate representatives in the resolution process should be made;
- Once agreed actions have been taken, complainants (and other stakeholders, where appropriate) should be consulted to determine whether satisfactory resolution of the grievance has occurred;
- The grievance should only be closed out once a satisfactory resolution has been acknowledged by all relevant parties.

Iluka will advise ERR of community concerns or complaints:

- following investigation of the concern or grievance; and
- during the resolution process as required, including notification of successful resolution.

## 5 Administration

### 5.1 Records management

Records associated with community/stakeholder engagement shall be administered as outlined in Table 5. U-docs refers to the Iluka document management system.

**Table 5: Record management matrix**

Record Type	Format	Record Location
Grievances	Electronic	Cintellate
Engagement records	Electronic	Consultation Manager

### 5.2 Roles and responsibilities

Table 6 sets out the roles and responsibilities for the implementation of this plan.

**Table 6: Roles and responsibilities**

Position	Role
Hamilton Operations Manager	Oversight of stakeholder consultation for the test pit operation. Complaint/grievance resolution, where applicable.
Test Pit Project Manager	Oversight of test pit site rehabilitation. Complaint/grievance resolution, where applicable.
Principal Environment Specialist	Oversight of test pit site environmental performance and compliance. Complaint/grievance resolution, where applicable.
Manager Stakeholder Relations	Engagement guidance/support. Internal review and endorsement of engagement plans

### 5.3 Plan endorsement

This plan is subject to acceptance and/or endorsement by DEDJTR Earth Resources Regulation as a subsidiary management plan to the WIM100 Test Pit (EL4282) Exploration Work Plan (Iluka 2018).



## 6 Document review

A revision of this CEP may be triggered by:

- changes to regulatory requirements for engagement;
- changes/updates to the WIM100 Test Pit (EL4282) Exploration Work Plan; or
- changes to community engagement strategy and methods.

These changes shall be subject to regulatory review and approval prior to that update being ratified and implemented.

Minor updates to this CEP (cosmetic edits, or amendments not material to the scope or application of the plan) will not be submitted for formal regulatory review and approval.

At any time that this CEP is updated, it shall be uploaded to / updated within the DEDJTR RRAM system.

This document is all times a controlled document within Iluka's document management system.

## 7 References

Australian Bureau of Statistics. (2017, Sept 21). Data by Region. Retrieved Apr 10, 2018

DEDJTR (2018) Environment Review Committee, Department of Economic Development, Jobs, Transport and Resources, State Government of Victoria

IAP2 (2014) Public Participation Spectrum, International Association for Public Participation Australasia, available: <https://www.iap2.org.au/About-Us/About-IAP2-Australasia-Spectrum>, accessed: 23<sup>rd</sup> April 2018

Iluka (2018) WIM100 Test Pit (EL4282) Exploration Work Plan

DEDJTR (2017) Preparation and Approval of Work Plans using RRAM: Guideline for Mineral Exploration Projects, v0.5 July 2017. Department of Economic Development, Jobs, Transport and Resources, Victoria.

DEDJTR (2018) Community Engagement Guidelines for Mining and Mineral Exploration in Victoria, available: <http://earthresources.vic.gov.au/earth-resources-regulation/licensing-and-approvals/minerals/guidelines-and-codes-of-practice/community-engagement-guidelines-for-mining-and-mineral-exploration>, last updated 7<sup>th</sup> June 2017.

*Mineral Resources (Sustainable Development) Act 1990* (Vic)

*Mineral Resources (Sustainable Development) (Mineral Industries) Regulations 2013* (Vic)

## 8 Acronyms

BGLC	Barengi Gadjin Land Council
DEDJTR	Department of Economic Development, Jobs, Transport and Resources (VIC)
DELWP	Department of Environment, Land, Water and Planning (VIC)
DHHS	Department of Health and Human Services (VIC)
DoEE	Department of Environment and Energy (Cth)
EES	Environment Effects Statement
EPA	Environment Protection Authority (VIC)
EPBC	<i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cth)
ERC	Environment Review Committee (Douglas)
ERR	Earth Resources Regulation
GHCMA	Glenelg-Hopkins Catchment Management Authority
GWMW	Grampians Wimmera Mallee Water
HRCC	Horsham Rural City Council
Iluka	Iluka Resources Limited
LACA	Land Access and Compensation Agreement
MRSDA	<i>Mineral Resources (Sustainable Development) Act 1990</i> (VIC)
WPV	Work Plan Variation

## **9 Appendices**

### **9.1 Appendix 1 – Iluka Group Procedure: Grievance Management**